



September 23, 2013

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95912

via web portal - <http://www.arb.ca.gov/lispub/comm/bclist.php>

RE: Proposed Amendments to the Consumer Products Regulations

Clerk of the Board:

Diversified CPC appreciates the opportunity to comment on the amendments to the Consumer Products regulation. These amendments are to be heard by the California Air Resources Board on September 26, 2013.

Diversified CPC International is a supplier to the Consumer Products Industry. Our company has a facility in the South Coast Air Quality Management District. Diversified CPC operates a processing facility in Anaheim, CA that produces high quality natural gas liquid propellants for the consumer aerosol products industry. Diversified has these specific comments on the amendments:

- Diversified supports the inclusion of the HFO-1234ze compound into the VOC definition as a VOC exempt compound. This compound is nonflammable, non-ozone depleting, negligible reactive, has a low GWP and does not have any adverse health impacts. If exempted this will be another tool for reformulation.
- Diversified supports the scientific pathway being taken by the staff in dealing with the Low Vapor Pressure (LVP) provision. LVP compounds are extremely important in maintaining compliance with current and future VOC limits. The LVP provision is needed to provide technical feasibility to the current VOC limits.

In conclusion we appreciate the staff's willingness to review Industry's technical data. We support the current amendments to the Consumer Products Rule.

Thank you for your consideration to these comments. Any questions or comments feel free to contact our consultant Doug Raymond at 440-474-4999 or at [djraymond@reg-resources.com](mailto:djraymond@reg-resources.com).

# Diversified CPC International, Incorporated

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Sincerely,

DIVERSIFIED CPC INTERNATIONAL, INC.

William A. Frauenheim, III

Vice President, Operations

Cc: Carla Takemoto, Air Resources Board

Doug Raymond, Raymond Regulatory Resources (3R), LLC